

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

DEC 13 2016

David J. Bradley, Clerk

United States of America  
v.  
Rodolfo SANTAMARIA-YBARRA  
YOB: 1987  
POB: Mexico

Case No. M-16-2287-M-01

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 12, 2016 in the county of Hidalgo in the Southern District of Texas, the defendant(s) violated:

Code Section	Offense Description
21 USC 841 (a) (1)	Knowingly and intentionally possess with intent to distribute approximately 152.440 kilograms of marijuana, a schedule I controlled substance.

This criminal complaint is based on these facts:

On December 12, 2016, at approximately 4:20 pm, Border Patrol Agents were performing line watch operations in the area of Doffing Road, south of San Juan, Texas. Border Patrol Agents observed a maroon Jeep Grand Cherokee heading south on San Juan Road toward the Rio Grande River. Agents observed the vehicle being loaded with large black bundle like objects, consistent to the manner in which bulk marijuana is commonly concealed. (See Attachment I)

☒ Continued on the attached sheet.

*Hunter M. Steadman*

Complainant's signature

Hunter M. Steadman, Special Agent, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date:

December 13, 2016  
8:25 am

*Peter E. Ormsby*

Judge's signature

City and state:

McAllen, Texas

Peter E. Ormsby, U.S. Magistrate Judge

Printed name and title

Attachment I

Agents then radioed the description of the maroon Jeep to other Border Patrol Agents in the area. As it traveled north bound on San Juan Road, Border Patrol Agents responding to the area observed a matching maroon Jeep traveling north bound on San Juan Road.

As Border Patrol Agents approached the vehicle with their emergency lights engaged, the Jeep quickly attempted to turn back towards the river, getting stuck in a ditch. Agents observed the driver, later identified as Rodolfo SANTAMARIA-YBARRA (YOB: '1987), exit the maroon Jeep, and run on foot approximately twenty yards before being apprehended by Border Patrol Agents.

Border Patrol Agents also observed a female, later identified as Chimira GLOVER (YOB: '1987), exit the front right passenger door of the maroon Jeep, fleeing approximately ten yards before being apprehended by Border Patrol Agents.

Border Patrol Agents observed a total of eight large bundles of marijuana located inside the Jeep.

On the same date, at approximately 6:09 p.m., DEA Special Agent Hunter Steadman and DEA Task Force Officer Joseph Lucio made contact with Rodolfo SANTAMARIA-YBARRA at the Weslaco, Texas Border Patrol Station. TFO Lucio, as witnessed by SA Steadman read SANTAMARIA-YBARRA his Miranda Rights in his preferred language of English. SANTAMARIA-YBARRA stated he understood his rights and agreed to speak with Agents.

SANTAMARIA-YBARRA stated that he was aware that he was transporting illegal narcotics in return for \$5,000 (U.S. Currency). SANTAMARIA-YBARRA implicated GLOVER in the transportation of the marijuana who was also going to be compensated with U.S. Currency.